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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JUN 16 2020

SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

KYLE RAY CAMPBELL,  
CAMERON EARL CAMPBELL,  
LEANN MARIE WAKE, and  
CASEY RAY BOCKMAN

Defendants.

**2:20-CR-72-RMP**

INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1),  
(b)(1)(A)(vi), 846  
Conspiracy to Distribute 400 Grams  
or More of Fentanyl (Count 1)

21 U.S.C. § 841(a)(1),  
(b)(1)(A)(vi)  
Possession with the Intent to  
Distribute 400 Grams or More of  
Fentanyl (Count 2)

Forfeiture Allegations  
21 U.S.C. § 853

The Grand Jury charges:

COUNT 1

Beginning on a date unknown but by on or about October 2019, continuing  
until on or about June 16, 2020, in the Eastern District of Washington and  
elsewhere, the Defendants, KYLE RAY CAMPBELL, CAMERON EARL  
CAMPBELL, LEANN MARIE WAKE, and CASEY RAY BOCKMAN, did

1 knowingly and intentionally combine, conspire, confederate and agree together  
2 with each other and other persons, both known and unknown to the Grand Jury, to  
3 commit the following offense: Distribution of 400 grams or more of a mixture or  
4 substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-  
5 piperidiny] propanamide (aka Fentanyl), a Schedule II controlled substance, in  
6 violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi); all in violation of 21 U.S.C.  
7 § 846.

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COUNT 2

On or about February 12, 2020, in the Eastern District of Washington, the  
Defendant, CAMERON EARL CAMPBELL, knowingly and intentionally  
possessed with the intent to distribute 400 grams or more of a mixture or substance  
containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny]  
propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21  
U.S.C. § 841(a)(1), (b)(1)(A)(vi).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and  
incorporated by reference for the purpose of alleging forfeitures.

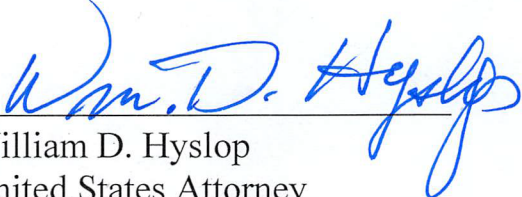
Pursuant to 21 U.S.C. § 853, upon conviction of an offenses in violation of  
21 U.S.C. § 841, as set forth in this Indictment, the Defendants, KYLE RAY  
CAMPBELL, CAMERON EARL CAMPBELL, LEANN MARIE WAKE, and  
CASEY RAY BOCKMAN, shall forfeit to the United States of America, any  
property constituting, or derived from, any proceeds obtained, directly or  
indirectly, as the result of such offenses and any property used or intended to be  
used, in any manner or part, to commit or to facilitate the commission of the  
offenses.


If any of the property described above, as a result of any act or omission of  
the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

DATED this 16 day of June 2020.

  
William D. Hyslop  
United States Attorney

  
Caitlin Baunsgard  
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